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EXHIBIT 7

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13
14 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

15	In re:	Bankruptcy Case
16	PG&E CORPORATION	No. 19-30088 (DM)
17	-and-	Chapter 11
18	PACIFIC GAS AND ELECTRIC	(Lead Case)
19	COMPANY,	(Jointly Administered)
20	Debtors.	OFFICIAL COMMITTEE OF TORT
21	<input type="checkbox"/> Affects PG&E Corporation	CLAIMANTS' RESPONSES TO
22	<input type="checkbox"/> Affects Pacific Gas and Electric Company	CALIFORNIA GOVERNOR'S OFFICE
23	<input checked="" type="checkbox"/> Affects both Debtors	OF EMERGENCY SERVICES' FIRST
24	<i>*All papers shall be filed in the Lead Case,</i>	SET OF REQUESTS FOR ADMISSIONS
	<i>No. 19-30088 (DM)</i>	TO THE OFFICIAL COMMITTEE OF
		TORT CLAIMANTS

1 Pursuant to Rule 36 of the Federal Rules of Civil Procedure (the “**Civil Rules**”), as made
2 applicable by Rules 7036 and 9014(c) of the Federal Rules of Bankruptcy Procedure
3 (the “**Bankruptcy Rules**”), and the Local Rules for the United States Bankruptcy Court for the
4 Northern District of California, the Official Committee of Tort Claimants (the “**TCC**”), by and
5 through its undersigned attorneys, hereby responds to the California Governor’s Office of
6 Emergency Services’ (“**Cal OES**”) First Set of Requests for Admissions to the TCC. These
7 responses are made without waiver and with express reservation of:

- 8 (1) All objections relating to competency, relevancy, materiality, privilege and
9 admissibility of the responses and the subject matter thereof as evidence for
10 any purpose in the above-captioned chapter 11 cases (the “**Chapter 11
Cases**”) and in any other proceeding;
- 11 (2) The right to object to the use of any such responses, or the subject matter
12 thereof, on any ground in the Chapter 11 Cases and in any other proceeding;
- 13 (3) The right at any time to revise, correct, supplement or clarify any of the
14 responses contained herein; and
- 15 (4) The non-waiver of any attorney-client privilege or work-product protection
16 that otherwise would apply and the right to claw back any such attorney-
17 client privilege or work-product protected document that is produced
18 pursuant to Rule 502(d) of the Federal Rules of Evidence.

19 No incidental or implied admissions are intended by these responses. The following
20 responses are submitted without acknowledgement of the materiality or relevance of the
21 information requested or that the requests for admission in any way are reasonably calculated to
22 lead to the discovery of admissible evidence.

23 **II. GENERAL OBJECTIONS**

- 24 1. The TCC objects to each request for admission to the extent that it seeks disclosure
25 of information or data which is unduly burdensome or requires the TCC to do Cal OES’ work.
- 26 2. The TCC objects to each request for admission to the extent that it seeks disclosure
27 of information or data that is beyond the permissible scope of Civil Rule 26(b), in that such

1 information is not relevant to the subject matter of this proceeding and not reasonably calculated to
2 lead to the discovery of admissible evidence.

3 3. The TCC objects to each request for admission to the extent that it seeks disclosure
4 of information or documents incorporating or containing information which is protected by the
5 attorney-client privilege, the work-product doctrine, the common interest doctrine, or any other
6 privilege or protections, or which is material prepared in anticipation of litigation within the
7 meaning of Civil Rule 26(b).

8 4. The TCC objects to each request for admission to the extent that it prematurely seeks
9 information related to, or that would be the subject of, expert opinion and discovery. The TCC's
10 responses therefore to any request for admission are given without prejudice to its rights to produce
11 and rely on expert opinion and testimony regarding such issues.

12 5. The TCC objects to each request for admission to the extent that it is vague,
13 ambiguous, confusing, overly broad, unduly burdensome, or otherwise lacks sufficient precision or
14 particularity to permit a response.

15 6. The TCC objects to each request for admission to the extent that it assumes facts not
16 in evidence or that are otherwise erroneous.

17 7. The TCC objects to each request for admission to the extent that it seeks to require
18 the TCC to provide information or documents which are equally available to Cal OES as to the
19 TCC.

20 8. The TCC objects to the definitions provided in the requests for admission to the
21 extent that they impose obligations in excess of those permitted by the Civil Rules.

22 Each of the foregoing objections is incorporated into the TCC's response to each request
23 for admission set forth below.

24 **III. REQUESTS FOR ADMISSION**

25 **REQUEST FOR ADMISSION NO. 1:**

26 Admit the Debtor's negligence caused the Butte Fire.

27 RESPONSE: Objection. This request for admission is premature, unduly burdensome, not
28 reasonably calculated to lead to the discovery of admissible evidence, and outside the scope

1 of Civil Rule 26(b)(1) insofar as it is directed at the TCC as opposed to the Debtor. No
2 allegation has been made that the TCC caused the Butte Fire. Any response by the TCC to
3 this request for admission could not establish the Debtor's negligence or in any way narrow
4 the range of issues for trial. For Cal OES to substantiate its claims, the Debtor's negligence
5 must be admitted by the Debtor or proven by Cal OES.

6 **REQUEST FOR ADMISSION NO. 2:**

7 Admit the Debtor's negligence caused the Camp Fire.

8 RESPONSE: Objection. This request for admission is premature, unduly burdensome, not
9 reasonably calculated to lead to the discovery of admissible evidence, and outside the scope
10 of Civil Rule 26(b)(1) insofar as it is directed at the TCC as opposed to the Debtor. No
11 allegation has been made that the TCC caused the Camp Fire. Any response by the TCC to
12 this request for admission could not establish the Debtor's negligence or in any way narrow
13 the range of issues for trial. For Cal OES to substantiate its claims, the Debtor's negligence
14 must be admitted by the Debtor or proven by Cal OES.

15 **REQUEST FOR ADMISSION NO. 3:**

16 Admit the Debtor's negligence caused the North Bay Fires.

17 RESPONSE: Objection. This request for admission is premature, unduly burdensome, not
18 reasonably calculated to lead to the discovery of admissible evidence, and outside the scope
19 of Civil Rule 26(b)(1) insofar as it is directed at the TCC as opposed to the Debtor. No
20 allegation has been made that the TCC caused the North Bay Fires. Any response by the
21 TCC to this request for admission could not establish the Debtor's negligence or in any way
22 narrow the range of issues for trial. For Cal OES to substantiate its claims, the Debtor's
23 negligence must be admitted by the Debtor or proven by Cal OES.

24 **REQUEST FOR ADMISSION NO. 4:**

25 Admit the Butte Fire Claim asserts amounts that, in the absence of the Debtor's bankruptcy
26 would be enforceable against it under applicable law.

27 RESPONSE: Denied. For the reasons set forth in the *Omnibus Objection of the Official*
28 *Committee of Tort Claimants (Substantive) to Claims Filed by California Governor's Office*

1 of Emergency Services (Claim Nos. 87748, 87754, & 87755) (Dkt. No. 5096) (the “Claim
2 **Objection**”), Cal OES has failed to allege facts in the Butte Fire Claim that, if proven,
3 would support a right to recover from the Debtor by Cal OES irrespective of the Debtor’s
4 bankruptcy.

5 | REQUEST FOR ADMISSION NO. 5:

6 Admit the Camp Fire Claim asserts amounts that, in the absence of the Debtor's bankruptcy
7 would be enforceable against it under applicable law.

8 RESPONSE: Denied. For the reasons set forth in the Claim Objection, Cal OES has failed
9 to allege facts in the Camp Fire Claim that, if proven, would support a right to recover from
10 the Debtor by Cal OES irrespective of the Debtor's bankruptcy.

11 | REQUEST FOR ADMISSION NO. 6:

12 Admit the North Bay Fires Claim asserts amounts that, in the absence of the Debtor's
13 bankruptcy would be enforceable against it under applicable law.

14 RESPONSE: Denied. For the reasons set forth in the Claim Objection, Cal OES has failed
15 to allege facts in the North Bay Fires Claim that, if proven, would support a right to recover
16 from the Debtor by Cal OES irrespective of the Debtor's bankruptcy.

17 || REQUEST FOR ADMISSION NO. 7:

18 Admit that \$13.5 billion is enough money to fully satisfy all of the Fire Victim Claims as
19 that term is defined in paragraph 1.75 of the Debtors' and Shareholder Proponents' Joint Chapter 11
20 Plan of Reorganization dated December 12, 2019.

21 || RESPONSE: Denied.

22 || Dated January 31, 2020

BAKER & HOSTETLER LLP

By: /s/ Eric R. Goodman
Eric R. Goodman

*Attorney for The Official Committee of Tort
Claimants*